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July 12, 2010

Ms. Linda Blount
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P.O. Box 56488
Jacksonville, Florida 32241-6488

SUBJECT: Draft Environmental Impact Statement for the U.S. Marine Corps Joint Strike Fighter F-35B East Coast Basing at Marine Corps Air Station Beaufort, South Carolina, and Marine Corps Air Station Cherry Point, North Carolina; CEQ Number 20100199

Dear Ms. Blount:

The U.S. Environmental Protection Agency (EPA) has reviewed the referenced Draft Environmental Impact Statement (EIS) in accordance with its responsibilities under Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act (NEPA). The United States Marine Corps (USMC) proposes to base and operate 13 new F-35B Lightning II Joint Strike Fighter (JSF) squadrons at two installations on the East Coast of the United States: Marine Corps Air Station (MCAS) Beaufort in Beaufort County, South Carolina; and MCAS Cherry Point in Carteret and Craven Counties, North Carolina.

The USMC analyzed the basing of eleven operational squadrons and two fleet replacement reserve squadrons of the next generation F-35B military aircraft at thirteen candidate sites on the East Coast. These sites were identified primarily related to proximity and access to existing airspace and training ranges that would provide the capacity to conduct all required functions and missions. From the 13 sites, only two sites (MCAS Beaufort and MCAS Cherry Point) were carried forward for further detailed analysis in the Draft EIS. The other 11 sites were rejected from additional consideration due to mission incompatibilities and/or lack of sufficient infrastructure or airfield/airspace capacity.

The F-35B would replace legacy F/A-18A/C/D Hornet and AV-8B Harrier aircraft in the Second Marine Aircraft Wing currently based at MCAS Beaufort and MCAS Cherry Point. The USMC plans to transition from the legacy aircraft to the F-35B over a 13-year time frame, including facility construction. The four primary alternatives analyzed in the Draft EIS included split-siting alternatives for basing the operational and reserve squadrons at these two installations. Alternative 1 included basing three operational and two reserve squadrons at MCAS Beaufort and eight operational squadrons at MCAS Cherry Point. Alternative 2 included basing the two reserve squadrons at MCAS Beaufort and the eleven operational squadrons at MCAS Cherry Point. Alternative 3 included basing eight operational squadrons at MCAS

Beaufort and three operational and two reserve squadrons at MCAS Cherry Point. Alternative 4 included basing the eleven operational squadrons at MCAS Beaufort and the two reserve squadrons at MCAS Cherry Point. The no action alternative reflects conditions at the time prior to implementing F-35B basing on the East Coast. Alternative 1 was identified as the preferred alternative.

The Draft EIS analyzes the potential environmental impacts of aircraft transition, new construction and demolition of infrastructure, personnel changes, and aircraft operations associated with basing and operating these new aircraft. The estimated net change in military personnel and dependents for each of the basing alternatives varies widely after taking into account the departure of the legacy aircraft. For example, Alternative 1 would result in a net decrease of 294 military personnel and 561 dependents at MCAS Beaufort, but would result in a net increase of 1,194 military personnel and 2,323 dependents. Other alternatives have similar net gains or losses due to the proposed mix of aircraft.

The amount and nature of infrastructure needed for basing of the F-35B squadrons would vary with the number and type of squadrons assigned to a particular installation. In turn, construction and demolition of the infrastructure also depends on aircraft distribution and the capability of an existing basing location to accommodate the squadrons. To evaluate existing infrastructure, the USMC performed installation-specific construction and modification assessments for each basing alternative. Alternative 4 includes the most proposed new construction and demolition followed by Alternatives 3, 1, and 2.

To provide the training to ensure combat readiness, the F-35B would conduct operations in several types of areas: 1) MCAS airfield, 2) training ranges, and 3) restricted use airspace. Under the proposed action, no new auxiliary, expeditionary, or outlying landing fields would be required in order to base and operate F-35B aircraft. However, the USMC does maintain and utilize an existing Marine Corps Auxiliary Landing Field (MCALF) Bogue where F-35B landing field practice would occur. The majority of F-35B operations at MCALF Bogue would be generated by MCAS Cherry Point aircraft.

Based on our review of the Draft EIS, EPA has environmental concerns associated with the proposed action, primarily related to extensive noise exposure on- and off-base at all three air installations. The Draft EIS identifies that a significant number of residents currently experience adverse impacts from aircraft noise at MCAS Beaufort, MCAS Cherry Point and MCALF Bogue under existing (baseline) conditions. With the exception of Alternatives 1 and 4 at MCALF Bogue, implementation of all four action alternatives would increase the net number of people adversely affected by aircraft noise at all installations. While some noise zones showed a net decrease in the number of people that are noise-elevated by the project, most zones showed a net increase. The most notable increases were for residents in the 85+ decibel noise zone since it is the highest (noisiest), and the 65-70 decibel noise zone since it potentially includes residents currently living outside this noise zone that would become newly incorporated by the project due to an outward extension of the 65+ decibel noise contours. In addition, it appears there is the potential for disproportionately high and adverse human health or environmental effects of this project on minority and/or low-income populations, primarily associated with dramatic increases

in noise levels in these communities. EPA recommends a number of mitigation measures for the USMC to consider that would minimize the noise exposure in the surrounding communities.

EPA also identified additional concerns related to potential indirect and cumulative impacts. EPA recommends several actions that the USMC could implement during construction and long term operations to assist the area in meeting air quality standards in the future. Enclosed are our specific review comments which provide greater detail regarding EPA's environmental concerns, additional information requested, and recommendations to address these concerns.

We rate this document EC-2 (Environmental Concerns – with more information requested). We are concerned that the proposed action identifies the potential for impacts to the environment that should be avoided/minimized. Also enclosed is a summary of definitions for EPA's EIS ratings. We appreciate the opportunity to review the proposed action. Please contact Ben West of my staff at (404) 562-9643 if you have any questions or want to discuss our comments further.

Sincerely,

Heinz J. Mueller, Chief
NEPA Program Office
Office of Policy and Management

Enclosures

U.S. ENVIRONMENTAL PROTECTION AGENCY
ENVIRONMENTAL IMPACT STATEMENT (EIS) RATING SYSTEM CRITERIA

EPA has developed a set of criteria for rating Draft EISs. The rating system provides a basis upon which EPA makes recommendations to the lead agency for improving the draft.

RATING THE ENVIRONMENTAL IMPACT OF THE ACTION

- LO (Lack of Objections): The review has not identified any potential environmental impacts requiring substantive changes to the preferred alternative. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposed action.

- EC (Environmental Concerns): The review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact.

- EO (Environmental Objections): The review has identified significant environmental impacts that should be avoided in order to adequately protect the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). The basis for environmental objections can include situations:

    1. Where an action might violate or be inconsistent with achievement or maintenance of a national environmental standard;
    2. Where the Federal agency violates its own substantive environmental requirements that relate to EPA's areas of jurisdiction or expertise;
    3. Where there is a violation of an EPA policy declaration;
    4. Where there are no applicable standards or where applicable standards will not be violated but there is potential for significant environmental degradation that could be corrected by project modification or other feasible alternatives; or
    5. Where proceeding with the proposed action would set a precedent for future actions that collectively could result in significant environmental impacts.

- EU (Environmentally Unsatisfactory): The review has identified adverse environmental impacts that are of sufficient magnitude that EPA believes the proposed action must not proceed as proposed. The basis for an environmentally unsatisfactory determination consists of identification of environmentally objectionable impacts as defined above and one or more of the following conditions:

    1. The potential violation of or inconsistency with a national environmental standard is substantive and/or will occur on a long-term basis;
    2. There are no applicable standards but the severity, duration, or geographical scope of the impacts associated with the proposed action warrant special attention; or
    3. The potential environmental impacts resulting from the proposed action are of national importance because of the threat to national environmental resources or to environmental policies.

RATING THE ADEQUACY OF THE ENVIRONMENTAL IMPACT STATEMENT (EIS)

- 1 (Adequate): The Draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

- 2 (Insufficient Information): The Draft EIS does not contain sufficient information to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the Draft EIS, which could reduce the environmental impacts of the proposal. The identified additional information, data, analyses, or discussion should be included in the Final EIS.

- 3 (Inadequate): The Draft EIS does not adequately assess the potentially significant environmental impacts of the proposal, or the reviewer has identified new, reasonably available, alternatives, that are outside of the spectrum of alternatives analyzed in the Draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. The identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. This rating indicates EPA's belief that the Draft EIS does not meet the purposes of NEPA and/or the Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised Draft EIS.

Draft Environmental Impact Statement for the U.S. Marine Corps Joint Strike Fighter F-35B East Coast Basing at Marine Corps Air Station Beaufort, South Carolina, and Marine Corps Air Station Cherry Point, North Carolina

SPECIFIC EPA REVIEW COMMENTS

Air Quality

After phase-out of the legacy aircraft, emissions from the majority of criteria air pollutants would decrease as a result of the proposed action, except for NOx and SOx. However, the project will still result in significant air emissions, especially during the early construction phases. EPA recommends the following as important emission reduction practices to be considered in the Final EIS and implemented as part of the project: 1) idle-reduction practices; 2) switching to ultra low-sulfur diesel fuel; 3) retrofitting equipment to reduce emissions; 4) installing EPA-approved catalysts and filters; and 5) following the Leadership in Energy and Environmental Design (LEED) Green Building Rating System to require that all new construction meet LEED Silver Level certification (or better). Indoor environmental quality should be a priority in the design and construction of these buildings, as much as practicable. EPA also suggests that the USMC consult EPA's Indoor Air Quality website (www.epa.gov/iaq) for suggestions on how to reduce indoor pollution sources. EPA recommends that the USMC consider and implement all reasonable and appropriate measures to reduce/prevent emissions from the construction and operation activities.

Noise

In general, the project noise analysis is well done. EPA appreciates the inclusion of information related to the use and function of the noise complaint systems at MCAS Beaufort and MCAS Cherry Point. However, the Draft EIS includes a number of inconsistencies in the data presented to describe the affected acres of various land uses within specific noise contours for each alternative. Although the Draft EIS identifies these inconsistencies in some instances, the explanations as well as the acreage differences in the tables are confusing. EPA recommends that the Final EIS consider normalizing the data, if appropriate, so that the data are consistent or, at a minimum, provide footnotes in each of the tables that rely on this data. The footnote should include adequate explanation to interpret these differences.

In general, the Draft EIS describes adverse noise impacts in terms of causing hearing loss or speech interference. The document concludes that permanent hearing loss due to the project is unlikely. However, EPA considers permanent or potential hearing loss to be a worst-case consequence of noise exposure that should not imply that no significant noise impacts are attributable to the proposed action. Speech interference was evaluated for closed and open window scenarios and was found to potentially occur in several communities near MCAS Beaufort and MCAS Cherry Point. There are many other effects of aircraft noise exposure to populations that should also be considered, including sleep interference, general annoyance, potentially related health effects, and limitations on outdoor recreational activities. EPA recommends that the Final EIS discuss these issues relative to expected project noise levels.

The Draft EIS identifies a net increase of residents that would experience aircraft noise exposure, both overall as well as within specific noise contours, for each action alternative at MCAS Beaufort, MCAS Cherry Point, and Marine Corps Auxiliary Landing Field (MCALF) Bogue. Since the project would generate additional aircraft noise, EPA assumes the size (outward extent) of the noise contours would be increased such that some residences in lower contours (e.g., 80 decibels averaged day and night (DNL)) would be shifted (incorporated) into higher contours (e.g., 85+ DNL). We similarly assume that some residents currently living outside the 65 DNL contour, would be newly incorporated into the 65 DNL or higher (65+ DNL) contours. EPA recommends that the Final EIS discuss (by alternative) how many new residents would be encompassed by the 65 DNL or higher contours due to the project at each installation. However, because not all residents would necessarily be shifted to higher (noisier) contours (e.g., due to project operational flight track patterns or different mix of operations), the Final EIS should also discuss if any residents were shifted into lower (quieter) contours (e.g., 80 to 75 DNL) or were removed from the 65 DNL contour due to the project despite an overall increase in aircraft noise by the project.

MCAS Beaufort

Baseline operations at MCAS Beaufort already affect the noise environment for approximately 7,170 people and 1,867 existing housing units located both on- and off-base. All four alternatives would increase the net number of people that would experience aircraft noise exposure at levels of 65 DNL or greater. Thirteen community sites (clusters of residences) would be elevated enough to have potential periods of speech interference for all action alternatives. We are pleased to note that no schools would be located in the 65+ DNL noise contours for any of the action alternatives.

Alternative 3 (+105 people) has the lowest and Alternative 2 (+839 people) an intermediate net increase in residents experiencing noise exposure due to the proposed action, while Alternative 1 (+1,555 people) and Alternative 4 (+1,191 people) showed the highest net increase. When these data are dissected by noise contour, all alternatives showed a net increase in the highest (noisiest) 85+ DNL contour; only Alternative 1 showed a net increase in the 80 DNL; no alternatives showed a net increase in the 75 DNL; all alternatives showed a net increase in the 70 DNL; and all alternatives showed a net increase in the 65 DNL contour.

At MCAS Beaufort, Alternative 1 (the preferred alternative) showed the highest net increase in additional residents exposed to project aircraft noise within the 65+ DNL contours, and also showed an increase in all contours except the 75 DNL. It also incorporates 87 people into the noisiest 85+ DNL contour and 809 people (possibly newly impacted people) into the 65 DNL contour.

MCAS Cherry Point

Baseline operations at MCAS Cherry Point already affect the noise environment for approximately 13,952 people and 3,758 housing units located both on- and off-base. Like MCAS Beaufort, all four alternatives would increase the net number of people that would experience aircraft noise exposure at levels of 65 DNL or greater. Twelve community sites

would be elevated enough to have potential periods of speech interference for all action alternatives. Unlike MCAS Beaufort, five schools (noise sensitive receptors) would be located within the 65+ DNL contour at MCAS Cherry Point.

Alternative 1 has the lowest net increase in residents experiencing noise exposure due to the proposed action (+1,452 people), while Alternative 3 showed the highest net increase (+3,053 people). Alternatives 2 and 4 showed intermediate levels of increases (2,477 and 2,225 people, respectively). When these data are dissected by noise contour, all alternatives showed a net increase in the highest (noisiest) 85+ DNL contour; Alternatives 3 & 4 showed a net increase in the 80 DNL; all alternatives showed an increase in the 75 DNL and 70 DNL contours; and Alternatives 1, 2 & 4 showed a net increase in the 65 DNL contour.

At MCAS Cherry Point, Alternative 1 (the preferred alternative) showed the lowest net increase in additional residents (albeit still a substantive population) exposed to project aircraft noise within the 65+ DNL contours, but still showed an increase in all contours except the 80 DNL. It also incorporated 78 people into the noisiest 85+ DNL contour and 988 people (possibly newly impacted people) into the 65 DNL contour.

MCALF Bogue

Baseline operations at MCALF Bogue already affect the noise environment for approximately 1,580 people and 694 housing units located off-base. Two of the four action alternatives (Alternatives 2 and 3) would increase the net number of people experiencing aircraft noise exposure at levels of 65 DNL or greater, while Alternative 1 showed no net difference and Alternative 4 showed a net decrease. Seven community sites would be elevated enough to have potential periods of speech interference depending on the action alternative. Like MCAS Beaufort, no schools would be located in the 65+ DNL noise contours for any of the action alternatives.

Alternative 1 showed no net difference (+0) in residents experiencing noise exposure, while Alternative 2 showed the highest increase (+230). Alternative 3 was an intermediate increase (+154), and Alternative 4 showed a net decrease in noise exposure (-488). When these data are dissected by noise contour, all alternatives showed a net increase in the highest (noisiest) 85+ DNL contour; Alternatives 1 and 3 showed a net increase in the 80 DNL; all alternatives showed an increase in the 75 DNL; no alternatives showed a net increase in the 75 DNL and 70 DNL contours; and all alternatives showed a net increase in the 65 DNL contour.

At MCALF Bogue, Alternative 1 (the preferred alternative) showed no net difference in additional residents exposed to project aircraft noise in the 65+ DNL contours and showed an increase in all contours except the 70 and 75 DNL contours, which showed significant net reductions. It also incorporated 11 people into the noisiest 85+ DNL contour and +660 people (possibly newly impacted people) into the 65 DNL contour.

In summary, the Draft EIS identifies that a significant number of residents currently experience adverse impacts from aircraft noise at MCAS Beaufort, MCAS Cherry Point and MCALF Bogue under existing (baseline) conditions. With the exception of Alternatives 1 and 4

at MCALF Bogue, the project under all four action alternatives and at all stations/airfields would increase the net number of people affected by aircraft noise. While some contours showed a net decrease in the number of people that are noise-elevated by the project, most contours showed a net increase. Perhaps the most notable increases were for residents in the 85+ DNL contour since it is the highest (noisiest) contour, and the 65 DNL contour since it potentially implies that residents currently living outside the 65 DNL contours would become newly incorporated into this noise zone by the project due to an outward extension of the 65+ DNL contours.

Despite the existing noisy conditions and predicted increases in project noise levels, no noise mitigation for affected residents is offered or discussed in the Draft EIS. Because noise exposure and population levels are significant, EPA recommends that the Final EIS discuss how noise can be minimized within the brackets of the USMC mission. Such methods might include the timing of training to avoid sleep interference, the rotation of operational flight tracts to more evenly distribute the noise exposure, or installation of air conditioning in residences so that windows can be closed to help attenuate inside noise. More direct land use mitigation, such as sound-proofing homes or purchasing homes from willing sellers starting within the highest (noisiest) contours, should also be considered. This would be particularly appropriate for residents incorporated into the 85+ DNL contour, which apparently would not occur but for the project. In general, off-station residents should be considered for mitigation first, starting with the higher contours (e.g., 85+, 80 and 75 DNL contours), assuming that on-station residents would already be covered under USMC regulations and policies. The Final EIS should also estimate the timeframe for the mission (months, years) so that residents will know approximately how long the additional aircraft noise exposure due to the project can be anticipated.

EPA supports development of land use plans and ordinances for lands outside MCAS Beaufort, MCAS Cherry Point and MCALF Bogue to limit possible future complaints from developers and or businesses not compatible with the USMC operations. EPA suggests that the USMC continue to utilize the noise complaint system at both installations and MCALF Bogue, if one does not currently exist, for affected residents to report any noise complaints or other incidents. Also, EPA recommends that periodic noise monitoring occur with such a frequency to determine any expansion ("creep") of the noise contours over time and possible incorporation of additional residences.

Environmental Justice

The Draft EIS includes a thorough analysis of the potential environmental impacts to low-income and minority communities immediately adjacent to MCAS Beaufort and MCAS Cherry Point by focusing on total population that would be affected by adverse noise levels from the various alternatives. The analysis using 2000 Census data shows that approximately 33 percent of this population at MCAS Cherry Point is low-income and 45 percent at MCAS Beaufort are minority. The results are similar for each of the alternatives. Compared to the state-wide averages for low-income (14 percent) and minority (30 percent), this represents a significant concentration of low-income and minority communities that should experience adverse noise impacts from the proposed action. In the zones with greatest noise impacts (>75 decibels), approximately 1,346 low-income individuals would be impacted at MCAS Cherry Point and approximately 1,118 minority individuals at MCAS Beaufort under the preferred alternative.

However, the Draft EIS concludes that there would not be any disproportionate impacts to low-income or minority populations.

Based on this analysis, EPA concludes that there is the potential for disproportionately high and adverse human health or environmental effects of this project on minority and/or low-income populations, primarily associated with noise impacts to these communities. The fact that there are currently adverse impacts to these populations under baseline conditions and that the additional impacts from the proposed action does not represent a "significant" increase over baseline conditions does not appear to be an appropriate interpretation of Executive Order 12898. Adverse effects are defined as "disproportionate" if the risk of adverse environmental impacts are predominately borne in areas with minority or low-income populations or if the impacts are greater in magnitude in areas with minority or low-income populations than in other areas. The adverse existing conditions demonstrate that these populations are already experiencing significant, adverse noise impacts. If percentages of low-income or minority populations are elevated within the project area, alternatives should be considered that avoid or minimize impacts to potential environmental justice areas. EPA recommends that the Final EIS discuss such alternatives as well as the potential application of some of the mitigation options described in previous comments on noise impacts.

EPA also recommends that the USMC coordinate with these affected populations to identify concerns and comments regarding the impacts of the proposed project and potential mitigation options. This coordination should include a clear discussion of the project, project updates or expansions, environmental impacts, any economic benefits of the project to the affected population, and the opportunity for informal and/or formal comments. Active public involvement with the potentially impacted communities and documentation of this coordination is an important part of the NEPA process and compliance with Executive Order 12898.

Indirect and Cumulative Impacts

Changes in civilian and contractor personnel associated with the introduction of the F-35B are anticipated under all alternatives. In addition, there would be student pilots associated with the Pilot Training Center. However, the Draft EIS does not include these non-military and student personnel changes in the analysis of impacts because they cannot be predicted with any "fidelity" at this time. EPA considers the addition of these personnel (and the associated environmental consequences) to be a potentially significant indirect impact of the proposed action. This is especially true if the flight operations associated with the student pilots are not included in the noise and airspace analyses. This issue should be addressed in the Final EIS. If the flight operations from student pilots are included in the Draft EIS, then these operations must be based on some training assumptions, including number of pilots and number of days. EPA recommends that the Final EIS include an analysis of the impacts of these personnel changes using either a worst-case scenario or some other reasonably foreseeable scenario.

If the impacts from these personnel increases can not be reasonably determined at this time, EPA recommends that the Final EIS include an adaptive management approach that addresses a process for supplemental NEPA documentation and public outreach to inform stakeholders of the result of the USMC final determination on base utilization by these additional

personnel. The Draft EIS suggests that as the F-35B program moves forward, the USMC will monitor its implementation, identify new potential environmental effects, evaluate results in relation to the new information in order to determine if reduction or mitigation of new potential consequences is required, and inform the public of substantive changes. EPA recommends that the Final EIS fully describe how this process would be implemented to address the above issues, as well as any other new impacts identified over the course of ramping up the F-35B program.

Training

The Draft EIS describes the training airspace and range activities associated with the F-35B, including air-to-ground ordnance delivery training within Ranges R-5306A and R-3007. The Draft EIS concludes that ordnance delivery at these ranges would not differ, nor exceed existing levels of use as presented in existing Environmental Assessments (EAs) completed for these ranges. Tables 2-24 through 2-27 identify significant increases (over 100 percent) in annual operations at these ranges, from an increase of 5,776 over baseline for Alternative 1 to 11,081 over baseline for Alternative 2. Given this inconsistency, EPA recommends that the Final EIS describe the levels and types of operations that were analyzed in the previous EAs and the extent to which the increase in operations described in the Draft EIS were appropriately analyzed in these documents. If they were not, EPA recommends that the Final EIS assess any impacts from increased ordnance delivery and training to recreational activities, commercial fishing, marine wildlife, or regional air quality in these ranges. EPA also recommends that the Final EIS explain the rationale behind the significant differences between the numbers of operations at these ranges between alternatives.

Facilities

The Draft EIS identifies a number of new construction projects at MCAS Beaufort and MCAS Cherry Point, including new hangars, air traffic control tower, and operations and maintenance facilities. To provide the necessary space for these new facilities, a number of similar existing buildings are proposed to be demolished. The Draft EIS does not discuss the potential for reuse of these buildings to meet the needs of the F-35B mission. To minimize the generation of construction waste (estimated at 10,014 tons at MCAS Beaufort and 27,662 tons at MCAS Cherry Point for the preferred alternative) and the potential for sediment impacts during demolition activities, EPA recommends consideration of building reuse if possible. The Final EIS should address this issue or describe the inadequacy of the existing facilities that would require the need for demolition and replacement with similar facilities. At a minimum, EPA recommends that the USMC recycle as much demolition debris as possible as part of new construction.

Construction of the new LHD/LHA training facility at MCAS Beaufort is identified as having the greatest amount of ground disturbing impact of any project, including loss of jurisdictional wetlands and upland vegetation. The Draft EIS does not adequately describe the nature and purpose of this training facility. Furthermore, the Draft EIS does not identify any alternative project locations that would serve to avoid or minimize impacts to jurisdictional waters of the United States. EPA recommends that the Final EIS better describe this facility and any potential for design modifications to minimize the impacts of this project on jurisdictional

waters, including wetlands. EPA appreciates the discussion of methods to minimize impacts to surface waters through appropriate stormwater management, including the use of Low Impact Development practices in the engineering, design, and construction of support facilities and structures.